## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA Plaintiff, VS. Defendants. Defendants. Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES

1. Subjects of Fact Discovery:

2. Subjects of Expert Discovery:

3. Can fact and expert discovery occur at the same time? Why/why not?

4. Pre-trial Deadlines:

**a.** Date for Initial Disclosures:

	<b>b.</b> Date for joinder/amendment:
	<b>c.</b> Date for close of fact discovery:
	<b>d.</b> Date for close of expert discovery, if bifurcated:
5.	Do the parties want a Rule 502 non-waiver order – Yes or No?
	Are there any ESI issues to address? If yes, please explain:
7.	Protective Order – Yes or No? If yes, please explain:
	Respectfully submitted,